Getty file

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
NORTHERN CALIFORNIA SECTION
FRESNO DISTRICT OFFICE
5545 EAST SHIELDS AVENUE
FRESNO, CA 93727
(209) 445-~~5321~~ 5939

April 16, 1984

Mr. Gordon A. Turl
Getty Refinery & Marketing Company
P. O. Box 1476
Bakersfield, California 93302

Dear Mr. Turl:

On March 7, 1984, your facility was inspected by the Department staff to verify compliance with the conditions of the Interim Status Document and the provisions of the applicable Hazardous Waste Control Laws and Regulations. Pursuant to Section 25185(c), Chapter 5, Division 20, Health and Safety Code, a copy of the Inspection Report is enclosed for your records.

If you have any questions, please contact Thomas W. Kovac of this office.

Sincerely,

William A Hage

William A. Hage,
Acting District Manager

WAH:jh
Enclosure
cc: Tony Landis Senior Engineer w/attachments
Scott Smith
Regional Water Quality Control Board w/attachments
Richard Casagrande
Kern County Health Department w/attachments

Report of Inspection
Getty Refining and Marketing Company
Bakersfield Refinery
6451 Rosedale Highway
Bakersfield, California 93308
Inspection date: March 7, 1984
EPA I. D. # CAD 099457087

I. Purpose

Routine Interim Status Document (ISD) compliance inspection.

II. State Representative

Thomas W. Kovac

III. Facility Representative

A. Sue Luft, Environmental Engineer

IV. Facility Description and Waste Streams

The facility is a crude oil refinery for production of diesel fuel, gasoline, and fuel oil. Getty has pursued a program of delisting identified process streams. The Department of Health Services in correspondence dated October, 1982 has designated as non-hazardous waste waters generated by boiler blowdown, cooling tower blowdown, boiler plant brine, desalter water, stripped sour-water tank drainages, produced water from nearby wells, and disposed into two on-site underground injection wells. The remaining hazardous wastes generated by the Getty refinery are:

1. Empty chemical drums
2. Heat exchanger cleaning sludges
3. Oil-water separator sludge
4. Dissolved air float
5. Tank bottom sediments
6. Oil spill cleanup wastes
7. Asbestos from old insulation
8. Electrical equipment containing PCB's
9. Drummed oily wastes, contaminated products or clothing

All of the above listed wastes except No. 5 (tank bottom sediments) are at present stored on-site for greater than 90 days. A hazardous waste storage area that complies with State and Federal standards (40CFR, Part 264) was constructed in June, 1982 for storage of all

drummed wastes generated by the refinery. The Part B application for this storage facility is currently under review by the Department of Health Services.

Tank bottom sediments, heat exchanger bundle cleaning sludges and oil water-separator sludges are removed on a periodic basis and immediately transported and disposed of in an approved disposal site. Spill contaminated soils that are too large in volume to be drummed are also immediately transported for disposal at an approved site.

V. Discussion of Inspection Findings

An ISD checklist was completed in conjunction with a discussion of each condition contained in the existing ISD permit issued to the facility. Documents and records of the following items were given a detailed review:

1. Implementation procedures for Waste Analysis Plan
2. Facility Inspection logs
3. Safety Equipment Inspection logs
4. Training Program Records
5. Contingency Plan
6. Closure and Postclosure Plans including Financial Assurance documents
7. Groundwater Monitoring Program
8. Copies of Hazardous Waste Manifests

A comprehensive field investigation was conducted of all facility components associated with hazardous waste generation and management including:

1. Oil water separator
2. Old and new heat exchanger bundle cleaning area
3. Safety equipment
4. Waste water injection wells and associated wastewater treatment systems
5. Disolved air floatation units
6. Fencing and site security
7. Drum storage facility

Getty is continuing its efforts to obtain a ruling from the Department of Health Services to change the designation of its oil-water separator units at the refinery from "hazardous waste treatment unit" to "hazardous waste generation unit". Such a decision would exempt Getty from treatment requirements of RCRA. It is Getty's position that the oil-water separators (API, CPI) are an integral unit process at the refinery. Periodic cleanouts of sludges from these units are immediately transported and disposed of at approved disposal facility. The present Department of Health Services position is the oil-water separator units treat another RCRA listed waste (dissolved air float - waste No. 4) and are "treatment" units requiring permitting.

Getty is attempting to refine its accounting procedures to the point that removal of all containerized hazardous wastes generated at the refinery are removed off site for disposal within a 90-day period. This operational mode would disqualify the existing container storage area from RCRA permitting requirements.

Getty is also planning to construct a new waste water treatment plant to be operational by December, 1984. This new facility would also be exempt from RCRA due to the Department's delisting of waste water in October, 1982.

In July, 1983 Getty removed approximately 200-300 yards of soil in and around the former heat exchanger bundle cleaning area.

VI. Violations Requiring Corrective Action

No violations of the ISD conditions were observed during the inspection.

VII. Recommendations

The Regional Water Quality Control Board is currently having discussions with Getty regarding development of a soil and groundwater study for the entire refinery plant site, including the old heat exchanger bundle cleaning area. It is recommended that the Department work closely with the Board on review of this contamination study.

Getty has submitted a request, dated March 6, 1984, to rescind the ISD requirement for groundwater monitoring. Getty contends the only permittable hazardous waste facility at their Bakerfield Refinery is the drum storage area. Getty's position is that storage facilities constructed to RCRA standards are not subject to groundwater monitoring requirements.

Regional Board staff was contacted regarding implications of rescinding the ISD groundwater monitoring program. The Board has used the monitoring wells originally installed for ISD compliance in its study of the Getty refinery. It appears that the groundwater parameters listed in Section VII of the ISD are of limited value in the Board's ongoing investigation of areal groundwaters. Deleting Section VII would not adversely impact Regional Board efforts. Consequently, it is suggested that this issue be referred to the permitting unit in Sacramento with the recommendation that groundwater monitoring requirements in the ISD be deleted.

Current operations at the refinery allow for indirect recycling of dissolved air float (DAF) to be recycled through the oil-water separators. DAF is eventually removed from the process cycle in the oil-water separator sludge.